

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-14 are all the claims pending in the application. In response to the Office Action, Applicant respectfully submits that the claims define patentable subject matter.

I. Overview of the Office Action

Claims 1-14 are rejected under 35 U.S.C. § 102(e) as being anticipated by Leung (U.S. Patent No. 6,487,605). Applicant respectfully traverses the prior art rejections.

II. Prior Art Rejections

Disclosure of Leung.

Leung generally relates to a method for automatically backing up a Home Agent or a foreign agent in Mobile Internet Protocol (IP). A general protocol for extending HSRP and related redundancy protocols to synchronize higher level functions other than mobility binding lists in mobile IP are also disclosed.

Analysis

The Examiner asserts that Leung discloses all of the features of claims 1-14. Applicant respectfully disagrees with the Examiner's position, and submits that the claims are not anticipated by Leung.

Applicant respectfully submits that there is no teaching or suggestion in Leung of (nor does the Examiner provide specific support in the cited reference for) the feature "forwarding a destination address towards said Home Agent (HA) by said Mobile Node (MN) at roaming of said Mobile Node (MN) from said home network (HN) to said visited

network”, as recited in independent claim 1 and analogously recited in independent claims 2, 6, and 11. The Examiner cites column 6, lines 27-36 of Leung as allegedly disclosing this feature of the claims. However, this cited portion of Leung merely describes FIGS. 7B, 8, and 9, which depict how a router assumes the status of a standby Home Agent, and how a router entering a network segment can preempt an active Home Agent. Nowhere does this cited portion of Leung teach or suggest that the mobile node sends a registration request to the home agent as alleged by the Examiner, much less the claimed feature of “forwarding a destination address towards said Home Agent (HA) by said Mobile Node (MN) at roaming of said Mobile Node (MN) from said home network (HN) to said visited network”.

Further, Applicant respectfully submits that there is no teaching or suggestion in Leung of the feature “assigning said Foreign Agent (FA) to said Mobile Node (MN) by a Foreign Agent assigning entity (FAAE) at request of said Mobile node”, as recited in the claim. The Examiner cites column 6, lines 48-59 of Leung as allegedly disclosing this feature of the claims. However, this cited portion of Leung merely discloses that an IP environment may include a group of routers which may function as home agents, and a network segment provides a home base for several mobile nodes. Nowhere does this cited portion of Leung teach or suggest “assigning said Foreign Agent (FA) to said Mobile Node (MN) by a Foreign Agent assigning entity (FAAE) at request of said Mobile node”, as recited in the claims.

Still further, Applicant respectfully submits that there is no teaching or suggestion in Leung of the feature “establishing a path between said Home Agent (HA) and said Foreign Agent by said Home Agent”, as recited in the claims. The Examiner cites column 3, lines 44-48

of Leung as allegedly disclosing this feature of the claims. It continues to remain unclear to Applicant how the Examiner interprets the cited reference. This cited portion of Leung discloses that a redundancy mechanism, Home Agency Redundancy Protocol (HARP) has been proposed for Mobile IP. Applicant fails to see the relevancy of this disclosure of Leung to the claimed invention.

Further, Applicant respectfully submits that there is no teaching or suggestion in Leung of the feature “establishing a path between said Foreign Agent (FA) and said Mobile Node (MN) by said Foreign Agent (FA) based on said destination address”, as recited in the claims. The Examiner cites column 6, lines 48-59 of Leung as allegedly disclosing this aspect of the claim. However, this cited portion of Leung merely discloses that an IP environment may include a group of routers which may function as home agents, and a network segment provides a home base for several mobile nodes. Nowhere does this cited portion of Leung teach or suggest “establishing a path between said Foreign Agent (FA) and said Mobile Node (MN) by said Foreign Agent (FA) based on said destination address”, as recited in the claims.

With respect to independent claim 5, independent claim 5 recites in part:

A Mobile Node (MN) for use in a Internet Protocol mobility supporting system for supporting the roaming of said Mobile Node (MN) in a Mobile Internet Protocol Network from a Home Network (HN) towards a Visited Network (VN), said Home Network (HN) comprising a Home Agent (HA), said Mobile Node (MN) being connected to said mobile Home Network (HN), wherein said Mobile Node (MN) comprises a Foreign Agent Assignment requesting part (FAARP), adapted to request, at detection of entry of said Mobile Node in said Visited

Network (VN), a Foreign Agent assigning entity (FAAE) of said Home network (HN) to assign a Foreign Agent (FA) to said Mobile Node (MN).

The Examiner broadly cites column 6, lines 28-59 and column 3, lines 44-53 of Leung as allegedly disclosing every aspect of independent claim 5. Applicant again fails to see the relevancy of this disclosure of Leung to the claimed invention. The Examiner does not point out with any specificity how the features of the claimed invention allegedly read on the cited reference. Nevertheless, Applicant respectfully submits that there is no teaching or suggestion in Leung of at least “a Foreign Agent Assignment requesting part (FAARP), adapted to request, at detection of entry of said Mobile Node in said Visited Network (VN), a Foreign Agent assigning entity (FAAE) of said Home network (HN) to assign a Foreign Agent (FA) to said Mobile Node (MN)”, as recited in the claim.

With respect to independent claim 9, independent claim 9 recites in part:

said Home Agent (HA) comprises a Foreign Agent Assigning Entity (FAAE) according any of the claims 6 to 8 and that said Home Agent (HA) further comprises a Home Agent Path Establishing Part (HAPEP), coupled with an output to an input of said Foreign Agent Assigning Entity (FAAE) and adapted to establish a connection between said home agent (HA) and said assigned Foreign Agent (FA).

These features are also analogously recited in independent claim 10. The Examiner yet again broadly cites column 6, lines 28-59 and column 3, lines 44-53 of Leung as allegedly disclosing every aspect of independent claim 9 and analogous independent claim 10. The Examiner again fails to address with any specificity how the features of claims 9 and 10 read on the cited portions of Leung. Nevertheless, Applicant respectfully submits that there is no

teaching or suggestion in Leung of the feature “said Home Agent (HA) comprises a Foreign Agent Assigning Entity (FAAE) according any of the claims 6 to 8 and that said Home Agent (HA) further comprises a Home Agent Path Establishing Part (HAPEP), coupled with an output to an input of said Foreign Agent Assigning Entity (FAAE) and adapted to establish a connection between said home agent (HA) and said assigned Foreign Agent (FA)”, as recited in the claim.

With respect to independent claim 14, claim 14 recites in part:

said access router (AR) comprises an Access Router Path Establishing Part (ARPEP) adapted to establish a path between said Access Router (AR) and said Mobile Node (MN) based on forwarding information provided to said Access Router by said Mobile Node.

The Examiner yet again broadly cites column 6, lines 28-59 and column 3, lines 44-53 of Leung as allegedly disclosing every aspect of independent claim 14. Applicant respectfully submits that there is no teaching or suggestion in this cited portion (or any other portion) of Leung that “said access router (AR) comprises an Access Router Path Establishing Part (ARPEP) adapted to establish a path between said Access Router (AR) and said Mobile Node (MN) based on forwarding information provided to said Access Router by said Mobile Node”, as recited in the claim.

Accordingly, Applicant respectfully submits that independent claims 1, 2, 5, 6, 9, 10, 11, and 14 should be allowable because the cited reference does not teach or suggest all of the features of the claims. Claims 3, 4, 7, 8, 12, and 13 should also be allowable at least by virtue of their dependency on independent claims 2, 6, and 11.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/Mark E. Wallerson/

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Mark E. Wallerson
Registration No. 59,043

Date: March 24, 2008